

DOCKET FILE COPY ORIGINAL
Cayce Douglas Kovacs
10223 Vernlyn
San Antonio, Texas 78230

K

July 20, 1994

RECEIVED

AUG 1 1994

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,



No. of Copies rec'd 1
List ABCDE



ESTABLISHED
1850

DOCKET FILE COPY ORIGINAL

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

July 19, 1994

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M. Street, N. W.
Washington, D.C. 20554

Dear Honorable Hundt:

The FCC proposal to enforce Billed Party Preference for inmate phone service is of great concern to me. Numerous negative ramifications for Kenosha County, Wisconsin will stem from the enforcement of Billed Party Preference.

There will be an inability to control telephone activity within the controlled environment of the Jail. This can result in instances of abuse and fraud that create security risks. It would be possible for inmates to use the telephones for making threats on judges, witnesses or victims involved in their cases.

Another effect the BPP will have is on the total elimination of any revenue sharing ability between Kenosha County and the telephone service carrier. This will create a loss of approximately \$100,000.00 to Kenosha County annually which will impact the availability of any of these funds to provide for future programming to aid inmates in the Kenosha County Jail.

Also, Billed Party Preference will create the inability of ensuring that the inmate telephone service company provide sensible and reasonable rate guarantees and rate monitoring services. This will eliminate the ability to acquire by competitive bid, the most cost effective service for inmates.

Again, my concerns are that these ramifications that will be created by BPP, will cause interference with Kenosha

John R. Collins County Executive

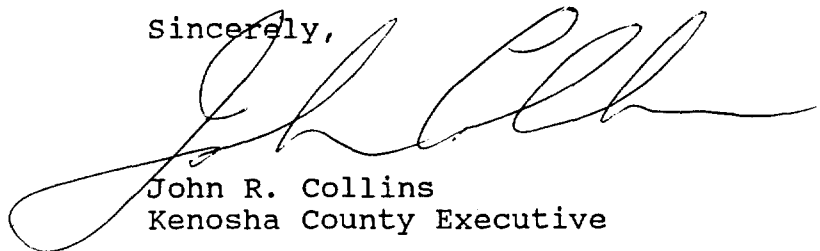
No. of Copies rec'd

List ABCDE

County's ability to manage and control telephone service to the inmates in the County Jail.

Thank you for your time and allowing me the opportunity to present our interests concerning Billed Party Preference. If you have any questions please feel free to give me a call at (414) 653-6536.

Sincerely,

A handwritten signature in black ink, appearing to read 'John R. Collins', with a long, sweeping horizontal line extending to the right.

John R. Collins
Kenosha County Executive

cc. U.S. Senator Herbert Kohl
U.S. Senator Russell Feingold
U.S. Rep. Peter Barca
The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness

Gene Stinnett

DOCKET FILE COPY ORIGINAL

2450 Rockaway
San Antonio, TX 78232

July 20, 1994

RECEIVED

AUG 1 1994

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Gene Stinnett

No. of Copies rec'd _____
List ABCDE _____

Julie Mitchell

DOCKET FILE COPY ORIGINAL

4819 Wordsworth
San Antonio, TX 78217

July 20, 1994

The Honorable Rachelle Chong
Federal Communications Commission
1919 M Street NW
Washington DC 20554

RECEIVED

AUG 1 1994

COMMUNICATIONS COMMISSION

Dear Representative Chong:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong opposition to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Julie Mitchell

No. of Copies rec'd 1
List ABCDE

JANIE SALAS
826 ALAMITOS
SAN ANTONIO, TX 78212

July 20, 1994

The Honorable Rachelle Chong
Federal Communications Commission
1919 M Street NW
Washington DC 20554

RECEIVED

APR 1 1994

Dear Representative Chong:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Janie Salas

No. of Copies rec'd 1
List ABCDE

Darlene Leckrone

DOCKET FILE COPY ORIGINAL

**2155 Field Rd.
Seguin, TX 78155**

July 20, 1994

The Honorable Rachelle Chong
Federal Communications Commission
1919 M Street NW
Washington DC 20554

RECEIVED

AUG 1 1994

Dear Representative Chong:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Darlene Leckrone

No. of Copies rec'd 1
List ABCDE

Paula Wills

DOCKET FILE COPY ORIGINAL

10055 Nugget Creek
Converse, TX 78109-1644

July 20, 1994

The Honorable Rachelle Chong
Federal Communications Commission
1919 M Street NW
Washington DC 20554

RECEIVED
AUG 1 1994
FEDERAL COMMUNICATIONS COMMISSION

Dear Representative Chong:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

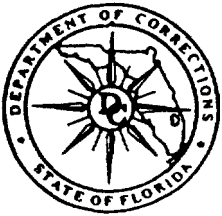
Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Paula Wills

No. of Copies rec'd 1
List ABCDE



FLORIDA
DEPARTMENT of
CORRECTIONS

DOCKET FILE COPY ORIGINAL

Governor
LAWTON CHILES

Secretary
HARRY K. SINGLETARY, JR.

2601 Blair Stone Road • Tallahassee, Florida 32399-2500 • (904) 488-5021

July 18, 1994

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Dear Chairman Hundt:

Re: CC Docket No. 92-77, Phase II

The Florida Department of Corrections is on record with the Federal Communications Commission as supporting Billed Party Preference (BPP) but opposing its application to the correctional environment.

We certainly support the Commission's efforts at implementing and considering rules which target benefits to the general consumer. Given that there is a significant benefit to providing telephone calling services to our inmates, one of our primary concerns in the area of consumer protection is members of the public who DO NOT want to receive any calls from an inmate(s). Equally important to us is to protect the family and loved ones of inmates in our custody from being charged exorbitant rates for those calls. We address both of these concerns.

Being able to guarantee long distance traffic to a provider allows the department to require that provider to include special features which protect the unsuspecting public from getting unwanted calls from inmates. Some of those features and their essential benefit to controlling inmate calls are as follows:

- Call branding - all of our systems employ automated operators and all calls are "branded" as coming from a state of Florida correctional facility. That branding allows the called party, which has no loved one incarcerated and therefore is not interested in accepting a call from an inmate, to terminate the call without incurring any charges;
- 3-way call detection/disconnect - this feature precludes inmates from using an intermediary to transfer the 0+, branded call to a third party as a direct, unbranded call. Inmates use 3-way calling to harass innocent individuals, witnesses, prosecutors, and even

Quality is Contagious

No. of Copies rec'd 1
List ABCDE

judges or to commit credit call fraud because the third party has no way of knowing the call is coming from a correctional facility.

PIN system - involves the assignment of unique personal identification numbers (PINs) to inmates and the implementation of an approved/validated list of numbers each inmate can call. This feature provides maximum control of inmate calls because the called parties can actually be contacted to determine whether they want to accept collect calls from the specific inmate. This feature is also invaluable in investigations relating to inside/outside criminal activities or escape plans. Validating and inputting approved numbers for 50,000+ inmates is obviously a very labor-intensive effort. Currently we have five institutions employing a PIN-system and the long distance carrier provides an "on-site administrator," at no cost to the department, to manage the PIN-system.

The department maintains its inmate phone system at no cost to the taxpayers of the state of Florida. There is no cost for equipment, no cost for local line charges, no cost for maintenance, and no cost for managing the system, including what would be substantial costs to administer the PIN-system. We can demand these services of our contracted providers only because we can guarantee them the call traffic.

In the Commission's "Further Notice of Proposed Rulemaking" dated June 6, 1994, regarding CC Docket No. 92-77, you speak to three principal benefits to the consumer should the Commission adopt BPP. We agree with and support those benefits to the general public upon passage of BPP, but we contend that none of those benefits accrue to any consumer involved in calls emanating from correctional facilities. Those benefits, as listed in Section III. 9. on Page 9 of the Notice, and our rebuttal follow:

1. Facilitate access to the telephone network by simplifying calling card, collect, and third party billed calling.
Our inmates do not have to dial any access numbers, except in the case of those facilities with a PIN-system where they have to dial their identification number. All calls are PIC coded to the contract carrier.
2. Allow OSPs to refocus their competitive energies to end users by precluding their need to pay commissions.
Our providers cannot charge exorbitant rates to cover the cost of paying commissions to the department. We require

The Honorable Reed E. Hundt
Page 3
July 18, 1994

a dominant carrier rate ceiling so calls emanating from our facilities can cost no more than those made by the general public for a 0+ call. We feel the ability of OSPs to pay us a commission is more a product of the tremendous traffic we guarantee which allows them to cut their percentage of profit. In other words, an OSP which knows it will have a certain high volume of traffic can provide commissions and make less per call but still make a profit.

3. Enable some AT&T competitors to effectively compete for customers who prefer not to use access codes. This must be the "MCI" benefit. Again, as we stated in 1. above, any benefit derived from BPP which addresses access codes or simplifying the selection of the preferred interexchange carrier is not an issue in the correctional environment.

In closing, we would like to impress upon the Commission the impact of BPP on our inmate calling system. It would put us out of the business. We are not obliged by law to provide extensive calling services to inmates. We do so as a service to the families and friends of the inmates and any privilege we are able to provide to inmates--or take away from them--greatly facilitates our ability to maintain order. It is essential that the department be able to maintain institutional control over inmate phone service. The application of BPP to the Florida Correctional System will eliminate the department's institutional control and will lead to fraud and abuse by inmates in the form of unsolicited as well as abusive calls to innocent parties. The Commission's motivation of benefitting consumers by applying BPP to the correctional environment will actually lead to injury to consumers and increased complaints to the Commission.

The department's only alternative will be to eliminate inmate telephone services. This action will be necessitated if BPP is applied to the correctional system because of the resultant loss of institutional control. The taxpayers of this state will not pay the estimated \$10 million a year for the inmate calling system we currently receive free. The elimination of inmate telephone service will in turn lead to the deprivation of innocent inmate families of their ability to communicate with their incarcerated loved ones other than by mail.

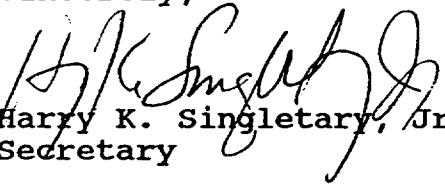
We implore you to pass BPP with an exemption for correctional facilities funded by federal, state, or local tax dollars. The Federal Communications Commission and most assuredly the Florida Public Service Commission will be inundated with complaints from

The Honorable Reed E. Hundt
Page 4
July 18, 1994

the family and friends who will no longer be able to receive frequent phone calls from our inmates because, with BPP, we've been forced to cancel our contracts and remove the phones.

Your consideration is appreciated.

Sincerely,


Harry K. Singletary, Jr.
Secretary

HKSJr/MJ/cjb



RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Garry E. Lucas
Sheriff

July 22, 1994

DOCKET FILE COPY ORIGINAL

The Honorable Andrew C. Barrett
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Billed Party Preference; CC Docket No. 92-77

Dear Commissioner Barrett:

The Federal Communications Commission (FCC) is currently considering a rule change in the matter of Billed Party Preference for 0+InterLATA Calls, CC Docket No. 92-77. Under current FCC rules Correction Officials designate the carrier of all inmate collect calls from the facility.

Billed Party Preference would change the current rules and allow inmates to designate the carrier depending on who they were attempting to contact.

As the Chief Law Enforcement Official in Clark County, the rule change concerns me for the following reasons:

- * **Protection of Victims and Witnesses of Crimes:** Our current telephone services, and equipment from our carrier allow us to block phone numbers of victims and witnesses of criminal activity. If the rules were changed, the burden of protection would shift from law enforcement to the victims themselves. The public will have to contact their long distance carrier, determine where the calls are originating, and make arrangements for their phones not to accept these calls.

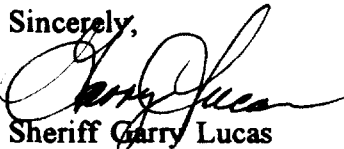
In addition to the phone block service, the phone system allows us to document the date, time and duration of each call made from our facility. This information has served in court cases to collaborate criminal activity, or to verify certain rights and privileges such as access to Bondsman and Attorneys were afforded to the inmates.

No. of Copies rec'd _____
List ABCDE _____

- * **Reduction of Revenue for Inmate Services:** Under the current arrangements with phone companies allow for revenue sharing. There are very strict rules which allow to these revenues that allow for these funds to be used only for inmate Health and Welfare. These funds go to reducing medical costs, repair of recreational equipment, education programs and health services that are not currently budgeted. Considering the current budget problems all Federal, State and Local agencies are experiencing, I am not optimistic about getting additional funding for these services and would have to consider the reduction or elimination of these programs.

For the concerns outlined previously, I am encouraging you strongly consider exempting Correctional Facilities from the Bill Party Preference.

Sincerely,



Sheriff Garry Lucas
Sheriff of Clark County
Vancouver, Washington

August 1, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

RECEIVED

AUG 1 1994

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

Linda G. McGuire Chief Jailor
Name/Title

Tazewell County Jail
Name of Correctional Facility

104 Court Street, Tazewell, Va.
Address 24651

No. of Copies rec'd 1
List ABCDE



OFFICE OF THE SHERIFF

DOCKET FILE COPY ORIGINAL

P.O. BOX 15125

• CHESAPEAKE, VA 23328

• TELEPHONE: (804) 547-6159

ADMINISTRATIVE OFFICE FAX: (804) 436-8392

CORRECTIONAL CENTER FAX: (804) 436-8525

JOHN R. NEWHART, SHERIFF
NOAH BYRUM, JR., UNDERSHERIFF
CLAUDE A. STAFFORD, JR., CHIEF DEPUTY

July 25, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D. C. 20554

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

RE: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.


We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

No. of Copies rec'd _____
List ABCDE

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions--decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,


John R. Newhart, Sheriff
Chesapeake Sheriff's Office

JRN:cj

DOCKET FILE COPY ORIGINAL

Madison County Sheriff's Department

PO BOX 16, WAMPSVILLE, NEW YORK 13163

RONALD I. CARY
SHERIFF

D. P. BAILEY
UNDERSHERIFF

LT. G. E. ABRAMS
CRIMINAL DIVISION

LT. P. M. PURDY
CORRECTIONAL DIVISION

SHERIFF	(315) 366-2318
UNDERSHERIFF	366-2404
JAIL	366-2289
EMERGENCY	366-2311
CIVIL DIVISION	366-2324
	366-2325
PISTOL PERMITS	366-2406
SHERIFF'S IDS	

July 25, 1994

RECEIVED

AUG 1 1994

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

RE: CC Docket No. 92-77 Opposition to Billed
Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security land administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of inmates will be devastated. The resulting increase in tension

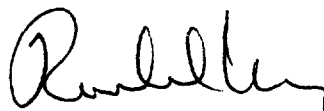
No. of Copies rec'd _____
List ABCDE _____

will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is the is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions--decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ronald I. Cary".

Ronald I. Cary
Madison County Sheriff

RIC/kam



BOYCE L. CARSWELL, SHERIFF

July 22, 1994

DOCKET FILE COPY ORIGINAL

RECEIVED

AUG 1 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Dear Chairman Hundt:

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trailed to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciated the FCC's concern if some Sheriffs do not take responsibility for inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important /

No. of Copies rec'd _____
List ABCDE

security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions--decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,



Boyce L. Carswell, Sheriff

Polk County Sheriffs' Department
Post Office Box 69
105 Ward Street
Columbus, North Carolina 28722

BLC/sdp

cc: The Honorable James H. Quello
The Honorable Rachelle B. Chong
The Honorable Andrew C. Barrett
The Honorable Susan Ness

August 1, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

RECEIVED

AUG 1 1994

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

H. Stanley Abraham
Name/Title

Seneca Co Correctional Facility
Name of Correctional Facility

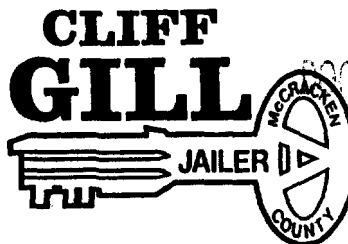
44 W. Williams St. Waterloo, N.Y.
Address

13165

cc; The Honorable James H. Quello
The Honorable Rachelle B. Chong
The Honorable Andrew C. Barrett
The Honorable Susan Ness

No. of Copies rec'd _____
List ABCDE _____

400 South 7th Street
Paducah, Kentucky 42003
(502) 444-4723



POCKET FILE COPY ORIGINAL

Vadis Turnbow
Secretary

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

July 25, 1994

Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Honorable Hundt:

The imposing of Billed Party Preference by the FCC would interfere with the ability of Jailers to manage and control inmate calling.

Under BPP an inmate could select any long distance carrier and I would loose security and fraud control which I presently have on the phone system.

BPP would also cut revenue McCracken County receives from the inmate phone system which is in excess of \$4,000 per month. The McCracken County Jail presently averages 290 phone calls daily.

Security Telecom, our inmate phone service provider, installed a six station computer system along with a video imaging system, a \$60,000 installation, at no cost to the County.

Your help in getting the Billed Party Preference stopped would be greatly appreciated by myself and McCracken County.

Enclosed are some of the comments made about BPP by Sheriffs and Jail Administrators across the country.

Sincerely,

Cliff Gill
McCracken County Jailer

CG:vt

Enclosures

cc: Honorable James Quello, Commissioner
Honorable Rachelle Chong, Commissioner
Honorable Andrew Barrett, Commissioner
Honorable Susan Ness, Commissioner

No. of Copies rec'd 1
List ABCDE

COUNTY OF NEVADA

PAUL RANKIN
SHERIFF - CORONER
ERIC ROOD ADMINISTRATIVE CENTER
950 MAIDU AVE
NEVADA CITY CA 95959-8617
(916) 265-1471

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

July 22, 1994

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: Billed Party Preference; CC Docket Number 92-77

Dear Commissioner Hundt:

I am the Sheriff and Jail Administrator of Nevada County, California. I am requesting that the Federal Communications Commission exempt local jails from the proposed "billed party preference" system for 0+ Inter LATA payphone traffic rules.

It would appear that we would be losing our ability to closely monitor telephone calls during investigations, and would likely lose our ability to quickly block calls to protect victims and witnesses from intimidation, as well as families and friends from unwanted calls and harassment. If this were to occur, the inmates present unlimited access to telephone service would have to be curtailed and those calls monitored or supervised by correctional officers. This would create a great inconvenience for the inmates and their families as well as a hardship on the already overburdened correctional staff. The eliminating of the 0+ commissions currently received from our present systems would impact numerous inmate welfare programs that are currently being funded through these sources to the detriment of the inmates.

I urge you to exempt local jails from this regulation. Thank you for your consideration.

Sincerely,



Paul Rankin
Sheriff-Coroner
Public Administrator

PR/vm

No. of Copies rec'd 1
List ABCDE

August 1, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

RECEIVED

AUG 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

James M. Calm M.A.
Name: Title

DANVILLE CITY JAIL
Name of Correctional Facility

212 LYNN STREET DANVILLE VA
Address
210 24543

No. of Copies rec'd 1
List ABCDE